


# EXHIBIT G

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# Healthcare Tech Legal Defense



 Jung Hoon Son is organizing this fundraiser.

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## Background

Hi everyone, my name is Jung Hoon Son. I am a physician, a trained pathologist (residency: New York Presbyterian - Columbia), who dove into healthcare tech wanting to combat impending physician burnout by better leveraging healthcare data.

I am forced to raise some funds immediately as a few unfortunate situations hit me concurrently:

- **pulseData's claim of "trade secret misappropriation"** (Lawsuit filed May 2023)
- **Terminal cancer (Stage 4 cholangiocarcinoma) of my mother-in-law** (Symptoms started in October 2022, delayed diagnosis in Feb 2023)
- **Personal financial strain** from the above events.

## 1. Claims of "Trade Secret Misappropriation": pulseData vs. Jung Hoon Son

- The trade secret misappropriation law is broken.
- I resigned from my role at a fledgling startup pulseData in November 2022, because I started to recognize that I was burning out from lack of ancillary support doing too much at a small company. With various external factors at play, the request for a simple 1 week off to recharge was unreasonably denied as well.
- The filed complaint mentions absolutely no details about the trade secret that I am allegedly misappropriating: it'd be really nice if they specify what trade secret they have.
- For everyone out there, and lawyers reading this who may want to get involved in the case, I do not possess any trade secrets, let alone having financially benefitted from anything. Instead, they keep pursuing me as I try to continue on my career path.

## 2. Mother-in-law's Stage 4 Cholangiocarcinoma


Meanwhile, one of the lingering thoughts in my head, as I resigned, was my mother-in-law's seemingly cancer-like symptoms - early satiety, strong aversion to food (she's a fantastic


\$750 raised of \$25,000 goal


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
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- For everyone out there, and lawyers reading this who may want to get involved in the case, I do not pursue any legal avenues to sue or having financial incentives from anything. Instead, they keep pursuing me as I try to continue on my career path.

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## 2. Mother-in-law's Stage 4 Cholangiocarcinoma

Meanwhile, one of the lingering thoughts in my head, as I resigned, was my mother-in-law's seemingly cancer-like symptoms - early satiety, strong aversion to food (she's a fantastic cook). My immediate thought: "this has to be stomach cancer, or cancer somewhere."

Their insurance oddly didn't cover the workup, so they had to reluctantly pay out of pocket for an upper/lower GI endoscopy, which gave her a false assurance that all is well ("chronic gastritis"). I had intended to take a breather from work and wanted to give my mother-in-law cash (out of pocket) to get a CT scan. I was planning to do that with the \$20,000 severance pay, until these legal processes started.

Sadly... that workup got much delayed into February 2023 (just before I started my new role) related to insurance and need to get a "reason for CT" first.

### A. CT guided core biopsy, liver:

**Positive for carcinoma, favor intrahepatic cholangiocar note.**

**Note: Immunohistochemical stains show the tumor cells a for CK7 and CD56, while negative for CK20, CDX2, synapt chromogranin, GATA3, SOX10, ER, glypican-3, arginase1 & PAX8 immunohistochemical stain shows nonspecific blus The CD56 positivity with the lack of synaptophysin and ch staining is considered to be nonspecific. Albumin-ISH is p tumor cells. Immunohistochemical stain for INSM1 will be an addendum. Block A2 is sufficient for molecular studies**

## 3. Major hit on personal finances

- As stated before my severance was voided (\$20k) after having worked there for 5 years on these allegations alone.
- I had a very end-of-the-year heavy (\$80k annual+biannual bonus) compensation structure, which most likely would've reset to \$0 after my CPO left.
- No income for (November 2022-February 2023), as they sunk my likely job prospect at SmarterDx (they were hit with cease & desist, apologies for all the craziness)
- Like most physicians, I have always been deeply in debt (medical school loans amount to \$350k+), so the proposed settlement citing any sort of "business damages" (what business damages did I possibly cause?) is substantial for my finances. **Isn't there a loose guidance of "don't squeeze a turnip" in law?**

Despite my attempts to resolve this matter quietly, the opposing counsel seems insistent on some substantial monetary settlement amount for the purported damages I caused, that FAR exceeds my ability to pay.

## Personal Relationships

- I've forcefully been disconnected from a lot of my colleagues at pulseData.
- My marriage relationship is taking a hit because of this.
- I worry about my son, Mark, a 4-year-old energetic genius. I do love him, and currently cannot provide the best care for him since November 2022. He's already famous - was featured in the official NYC news outlets including MTA TikTok:
- <https://www.tiktok.com/@mta/video/7158139087839317291>
- <https://patch.com/new-york/upper-west-side-nyc/little-upper-west-sider-mission-ride-every-train-nyc>



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#### What I'll do with the money:

Several law firms have quoted me:

- **Retainer: \$20-25k retainer to start**
- **Plus variable, outcome of the case: ranges from \$30k-\$50k+**

If in any case the fundraiser goes above the goal, I'd gladly donate the extra to another healthcare worker in a legal mess, especially given that healthcare tech has been treating physicians and clinicians very poorly during this startup boom.

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## Organizer



**Jung Hoon Son**

Organizer

New York, NY

Contact

## Words of support (1)

Please donate to share words of support.



**kshitij saxena**

\$100 • 23 hrs

Dr. Son is a friend and professional colleague.

Report fundraiser

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## Jung Hoon Son, M.D.'s Post



**Jung Hoon Son, M.D.**

Knowledge Architect @ Cerevel // Informaticist // clinical data expert // knowledge mapper  
18h

Lamenting about the U.S. legal system.

Why does even starting a defense for cases like this cost \$20k+ as a retainer?!

"Innocent until proven rich" seems more fitting motto for our legal system. 😞



**Jung Hoon Son, M.D.**

Knowledge Architect @ Cerevel // Informaticist // clinical data expert // knowledge mapper  
3d · Edited

### Navigating Legal, Tech, and Healthcare: Trade Secret Misappropriation and Terminal Cancer

In a very puzzling move from my ex-employer [pulseData](#), they've filed a lawsuit against me alleging that I misappropriated trade secrets. I have no trade secrets in possession and have not benefited in any way from my ex-employer's resources.

As a brief intro for those who don't follow me on LinkedIn, I combine an unusual set of skills & experience, sitting at the intersection of clinical experience, knowledge of U.S. healthcare scene, data viz, informatics, and data engineering. My training and skillset:

- ➡ Pathologist ([NewYork-Presbyterian Hospital](#))
- ➡ Biomedical informaticist ([National Library of Medicine \(NLM\)](#) fellowship [Columbia University](#))
- ➡ Data visualization
- ➡ Data engineering
- ➡ Reforming U.S. healthcare via raising health awareness

In fact, the legal actions are draining the resources I would otherwise use to take care of my family and more immediately importantly - my mother-in-law, who has been diagnosed with **stage 4 cholangiocarcinoma (with metastasis)** and as a pathologist, this is not a good cancer to have even without metastatic lesions.

We are hoping she gets to enjoy this summer at least, but the very industry I've trained for (healthcare in the U.S.) is making every step of this journey so painfully - denying authorization for FDA approved drugs, denial of coverage GI workup for GI symptoms, recent denial of home care aide) along with this lawsuit draining the little resources I have.

Meanwhile, the plaintiff's counsel appears to be treating this case like a standard white-collar case, wanting to settle this case for hair under what it costs to defend over time. I bring this case to wider audience with hopes to:

- ➡ **Find a reasonably priced defense counsel** (I do have sufficient income, just not \$20k+ retainer NOW given the circumstances)
- ➡ **GoFundMe for raising funds for the defense** (retainer itself is quoted to be \$25k): <https://gofund.me/3673bde7>
- ➡ **Possibility that someone reasonable on my ex-employer/opposing counsel side** will come to the realization they are squeezing a turnip (they are not open to reasonable negotiated amount & I have \$400k+ in medical school debt).

I didn't expect to become a pioneer in navigating the healthcare tech's legal world / trade secret world, but I realized through this unpleasant experience that many organizations are treating fellow physician and clinician friends in similar manner.

If there is surplus from this fundraiser - I will pledge to help some other clinicians in such legal situations in the future.

Attaching the complaint, if any lawyers can identify the "trade secret", let me know.

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